



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

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EC-1

JUL 1 1996

Ref: 8EPR-EP

Mr. Jerry E. Schmidt
Forest Supervisor
Routt National Forest
29587 West US 40, Suite 20
Steamboat Springs, CO 80487

Re: DEIS Review
Routt National Forest

Dear Mr. Schmidt:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Routt National Forest. We offer the following concerns and comments for your consideration as you complete the Final Environmental Impact Statement (FEIS). EPA's major concerns follow. The specifics of our concerns are in the attached detailed comments.

1. The DEIS concentrates on comparing broad land management alternatives. However, it appears that the Forest Service will be implementing additional plans to improve and maintain environmental conditions for all alternatives. The Land and Resource Management Plan and EIS should explain the Forest Service's general plans for soil conservation, reducing sediment, improving vegetation, and biodiversity, etc.
2. The EPA Review Team appreciates the data that went into developing the Routt's Revised Land and Resource Management Plan and EIS. It was a pleasure to review a plan with good maps and detailed information about existing forest conditions.
3. There were many issues raised in DEIS. However, it was occasionally difficult for the reviewer to understand the relative significance of issues, how the issues will be resolved or how the issues will be addressed by different alternatives. (See comments A.1, A.2, A.3, C.4, C.13, C.15)
4. The FEIS needs to incorporate the requirements from the 1995 reversion (RA95) bill that effect grazing allotment analysis and permits.

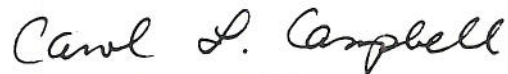


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Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS , the Preferred Alternative identified by the DEIS for the Routt National Forest will be listed in the Federal Register in the category EC-1. This mean that the review has identified environmental impacts that should be avoided in order to fully protect the environment and the DEIS generally contains sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. Attached is a summary of EPA's rating definitions.

The enclosed detailed comments are the basis upon which the EC-1 category was issued and are a part of our review. They should, therefore, be incorporated into your final document. We appreciate your interest in our comments. Please contact Dana Allen (303) 312-6870 if you have any questions about these comments.

Sincerely,



Carol L. Campbell, Director
Ecosystems Protection Program
Office of Ecosystems Protection
and Remediation

Enclosure

EPA's Detailed Comments on the
ROUTT NATIONAL FOREST - LAND AND RESOURCE MANAGEMENT PLAN
DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 1996

A. GENERAL

1. The DEIS concentrates on comparing alternatives A through G. However, it appears that there are some new management plans that apply to all alternatives. Throughout chapter 3, it appears that the Forest Service will be implementing additional plans to improve and maintain environmental conditions. The Land and Resource Management Plan (RMP) and EIS should explain the Forest Service's general plans for soil conservation, reducing sediment, improving vegetation, and biodiversity, etc. We suggest that this be added in either chapter 2 or at the start of each section in chapter 3.
2. The public and decision makers need to know more about the significance of environmental consequences for each resource category. Typically in the DEIS, the different alternatives are rated from most to least risk without measuring the alternatives against the desired condition. Alternatives ratings could also be compared to undesirable risk or conditions. For example, on page 3-95, in paragraph 3 (the effects of range management on sensitive species), the alternatives ranked from most to least risk are: A, E, D, G, B, C and F. However, the reader cannot tell if all, none or some of the alternatives have significant effects on sensitive plants. A clearer way to rank the alternatives would be to identify the level of grazing desirable to protect sensitive plants; then the alternatives could be evaluated against the desired condition.
3. For several resource categories in chapter 3, significant issues were raised in discussions of the affected environment and consequences. Unfortunately, these issues were not resolved in the rest of the discussions. For example, on page 3-22, Figure 3-2: shows 86% of the forest has a moderate to high erosional hazard. However, the DEIS does not discuss how the Forest Service will minimize erosion. This section should briefly outline the erosion control practices included in the proposed "Water Conservation Practices Handbook", and grazing and timber management plans.
4. The EPA Review Team appreciates the data that went into developing the Routt's Revised Land and Resource Management Plan. It was a pleasure to review a plan with good maps, background data, and detailed information about existing forest conditions.
5. The FEIS needs to incorporate the requirements from the 1995 Reclamation Act (RA95) bill that effects grazing allotment analysis, environmental assessment monitoring and prioritizes permits. We have enclosed the information package from the National Forest Service that discusses the law including the questions and answers for the new grazing requirements. One of the main things that

should be included in the FEIS is the revised schedule for NEPA compliance for grazing allotments and permits.

6. The FEIS should include a summary of the District's survey of mining impacts as required under CERCLA and the CWA Storm Water Program. If any significant mining problems were found on the Routt Forest, the FEIS should also include a schedule and a brief description of the Forest Service plans for abandoned mining properties.

B. ALTERNATIVES

1. Page 2-21, Paragraph Water: The Routt National Forest is part of the jurisdiction of the Northwest Colorado Council of Governments, which currently has water quality projects for the area. We would strongly recommend a provision for active involvement with NWCOG to assure that consistent approaches are taken toward water quality management in the forest. The State of Colorado also has Non-Point Source projects underway in the area, and we also recommend that the Forest Service become aware of, and active in these projects.
2. Page 2-27, Range Paragraph: There is no discussion of the environmental analysis required by the Recission Act of 1995 (RA95). The EIS or Forest Plan is required to establish procedures to set AUM levels on stream segments now listed as WQL, "threatened", or "at risk" segments per the USFS Region 2 RA95 NEPA Guidance.

C. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

1. Page 3-21, Resource Protection Measures: The Clean Water Act (CWA) requires BMPs to be equivalent to or better than those adopted in §319 Management Plans. The CWA also requires iterative loop analyses if water quality goals are not met after implementing generic BMPs. Please provide discussion describing how this requirement will be met.
2. Page 3-24, 2nd paragraph: We are unable to locate Table S-2 showing the proposed watershed improvement projects.
3. Page 3-36, Watershed Health Assessment: The reference (Ohlander, 1995) is for sediment only, how are other pollutants and habitat (aquatic habitat, macroinvertebrates) being analyzed?
4. Pages 3-36 and 3-38 and Appendix I, Table I-2 - Watershed Health Assessment and Table I-3 - Watersheds of Concern: Table I-2 identifies the disturbance and the sensitivity of the watersheds and the relative watershed condition for 145 watersheds within the Routt National Forest. Table I-3 lists watersheds of

concern. However, it is unclear to the reviewer how this information will be acted upon. For example, there are numerous watersheds which are on the concern list or which have a ranking of high sensitivity, large amount of disturbance and a poor or Class 2 watershed condition. However, it is unclear from the discussion in the affected environment sections how conditions will be improved in impacted watersheds. The FEIS should describe how the Forest Service will prioritize and implement improvements for watersheds with substantial disturbance. For example, will grazing, road construction, etc., be limited in watersheds of concern or high sensitivity.

5. Page 3-39, paragraph 3: Identifies forest streams that are impaired because of high metals concentrations. The final EIS should identify any actions the Forest Service will be taking to reduce metals concentrations in these impaired stream segments. For example, does the Forest Service plan to target any reclamation activities or clean water diversions around the sources of the metals pollution.
6. Page 3-39, Surface Water and page 3-105, Fisheries and Habitat: The FEIS should tie stream segments with impaired water quality and watersheds of concern with maintaining and creating fish habitat. In particular, how are Colorado cutthroat trout impacted or threatened by poor water quality (including sediment)?
7. Page 3-39, last paragraph: Please provide a reference to support the DEIS assertion that the integrity of the fluvial systems is overall "very good".
8. Page 3-42: The Forest Service should consider developing management plans to protect drinking water sources. We recommend that the FEIS include plans to develop a well head protection program for campgrounds and other areas that use groundwater. The Forest Service may also want to consider measures to protect the surface and groundwater from transportation of gasoline and other chemicals, gas stations, and agricultural chemicals.
9. Page 3-44: It should be noted that interpretation of color infrared photos can be hampered when some undesirable species, such as big sage have the same spectral fingerprint as desirable species such as blue grama.
10. Pages 3-46 through 3-49, Effects on Water Resources from Timber Harvesting: In Table 3-11 on page 3-49, the Soil and Water Improvement Activity; it is unclear from the discussion where soil and water improvements will be made under each of the different timber harvesting alternatives. We understand that there are different levels of disturbance for each of the timber harvesting alternatives, however, we were unable to find any mention of actual improvements being made in conjunction with timber harvesting.

11. Page 3-48, paragraph 2: This paragraph is particularly unclear. The FEIS would be improved by some background or introductory language on this concept.
12. Page 3-49, Paragraph 1: Since this is a high elk and deer population area, how will the riparian and upland forage be allocated between livestock and elk? How will elk and deer populations be kept in balance with their forage? Particularly, since recent data indicates that the Colorado Division of Wildlife computer projection of elk populations were low by over a factor of 2.
13. Pages 3-51 and 3-240 - 3-243, Range Management: It is unclear from the cumulative effects analysis if the proposed grazing rates and practices will maintain existing conditions for riparian and upland areas, or worsen conditions. The cumulative effects should also include wildlife grazing. For example, is alternative F the only alternative which will improve or maintain range conditions?
14. Page 3-51, Cumulative Effects: We have found that BMPs standards and guidelines are not always completely effective in meeting water quality standards. There should be a better link to monitoring cumulative effects and improving BMPs if standards are not achieved.
15. Biodiversity - Pages 3-54 through 3-63, and Appendix D: These sections describe the state of biodiversity in the forest. However, it is unclear if the current state of biodiversity (coarse filter) is acceptable or if measures need to be taken to improve biodiversity. For example, will the forest be managing timber to increase age diversity, to make a more open forest or increase the amount of forest "edge"? We recommend that the FEIS include a conclusion on the Forest's state of biodiversity.
16. Page 3-86, Effects - Riparian/Wetlands: If riparian areas are being restored by proper livestock/elk use, the lentic riparian/wetland areas should increase rather than not change from alternative to alternative.
17. Page 3-95, Paragraph 2: The results of implementing RA95 should be included in the effects summary for grasslands and sensitive plants.
18. Page 3-105, Paragraph 3: References should be included in FEIS for the stream inventories and habitat surveys in this paragraph.
19. Page 3-111, Paragraph 4: The effects of grazing should include both livestock and wildlife (elk, etc.). There appear to be currently serious winter range conflicts. The FEIS should discuss keeping wildlife in balance with their forage allocation.
20. Page 3-111, Paragraph 5: This paragraph states that all alternatives move allotments towards satisfactory condition (in terms of upland, riparian and stream condition); however, it is not clear how this will happen from the level of detail provided in the DEIS.

21. Page 3-126, Effects from Range Management: A discussion should be added on the Forest Service's grazing standards and guidelines (S&G), implementation procedures in accordance with RA95, and balancing of wildlife populations and livestock allocations. The DEIS should explain 1) how will permit AUMs be affected by this, 2) what term will permits be written for in each case, and 3) how and where will additional data be collected for environmental assessment requirements for long term grazing?
22. Page 3-131, Paragraph 4, and Page 3-136 (Hunting): How will the game populations be factored into forage allocation procedures and commitments for CO DOW to control herd size accordingly?
23. Pages 3-216 and 217 - Wild and Scenic Rivers: We recommend that the FEIS include a plan to revalidate the wild and scenic river studies for the Elk and Encampment Rivers.
24. Page 3-233, 1st paragraph: This paragraph should be amended to define geological zone 5 as shown in Figure 3-41.
25. Rangeland/Grazing - Pages 3-240 - 3-244: The FEIS needs to incorporate the requirements from the 1995 Recision (RA95) bill that effect grazing allotment analysis and permits. The main items that should be included in the FEIS are:
 - a. Schedule of grazing allotments needing NEPA analysis. The list should be prioritized and the NEPA analysis should be completed in 15 years.
 - b. Plan for monitoring to provide data for the NEPA analysis as recommended by the Forest Service, Region 2 guideline for RA95.
26. Page 3-242, Paragraph 1: Is there a noxious weed control plan that requires certified weed free hay use by people using horses for hunting etc.?
27. Page 3-243, Effects from Riparian and Wetland Management: Stubble height is highly controversial rule of thumb and has not been endorsed by documents such as "Rangeland Health" (NRCS Report - Reference 27)

D. PROPOSED REVISED LAND AND RESOURCE MANAGEMENT PLAN

1. Page 1-7, Table 1-2: Based on Reference #27 - "Rangeland Health", season-long management is not a recommended utilization.
2. Page 1-7 and Page 2-41, Range: Forest Service Region 2 NEPA Guidance for the Recission Act of 1995 requires a priority list for the issuance of grazing permits and an identification of areas needing additional environmental monitoring for future permit writing. This type of information should be included in the FEIS.

3. Other areas where RA95 should be included in this Management Plan are: a) Page 1-8, Paragraphs 3.d, f & h: These guidelines apply to livestock utilization; how will elk and other wildlife be factored in and controlled? b) Page 2-1: A key issue for EPA is how will these Forest Service Standards and Guidelines (S&G) be coordinated with BLM and NRCS S&Gs for land in the same ecosystem? c) Page 2-38, Range Guidelines and Page 2-40, Desired Condition: Define the schedule for grazing permit issuances based on RA95 USFS Region 2, NEPA guidance and the 20% per year rule. There is also no discussion of the range program to achieve desired future conditions in uplands and riparian areas.
4. Page 2-6: Define the standards and guidelines (S&G) for noxious weeds control through the use of only certified weed-free hay by recreational users in all back country areas.
5. Page 4-1: The Management Plan should provide more information on how the Forest Service is going to coordinate with the State of Colorado on water quality issues. The State currently has on-going projects in this area which may affect or be affected by Forest Service activities.
6. Page A-8: There should be goals for achieving water quality standards. For example, the Forest Service should meet CO water quality standards.
7. Page A-9, Municipal Supply Watersheds: The Forest Service must meet, or work, towards drinking water supply standards where applicable.
8. Page C-1: The reference to the Clean Water Act is obsolete. Please update the reference to include the 1987 Act which implemented Non-Point Source, §319 and the requirement to implement BMPs.